



Darrell W. Bruckert  
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December 18, 2003

Director,  
Air Enforcement Division  
Office of Regulatory Enforcement  
U.S. Environmental Protection Agency  
Mail Code 2242-A  
Ariel Rios Building  
1200 Pennsylvania Ave., NW  
Washington, DC 20460-0001

**Re: United States, et al., v. BP Exploration and Oil Co. Inc., Civil No. 2:96 CV  
095 RL, N. D. Indiana, Hammond Division, Lozano, J.**

**Annual Heater and Boiler Update Report Pursuant to Paragraph 15.H.iii of  
The Consent Decree Amended June 7, 2002**

**NO EPA ACTION REQUIRED – For Information Only**

Dear Director:

Enclosed is the "Annual Heater And Boiler Update Report" required by Paragraph 15.H.iii. of the captioned Consent Decree. Two copies of this update are enclosed. The first contains confidential information and is designated "**Confidential Business Information pursuant to 40 CFR Part 2**". By submission of these data, BP does not agree to the dissemination, release or provision of these data in any form to any other individual business, agency or other party, public or private. I am also providing a second copy of the Update Report that has been amended to delete the confidential information and may be publicly shared. As suggested in your August 1, 2002 letter to BP, we are submitting the CBI version in hard copy only. We will submit the non-CBI version in hard copy and in electronic format.

If you have any question, please call Darrell Bruckert at 630-848-5373.

Sincerely,

Robert A. Weldzius  
Director, Project Sunshine

Darrell W. Bruckert  
Sr. Environmental Advisor  
(630) 848-5373

cc: Director, Air Enforcement Division  
U.S. Environmental Protection Agency  
c/o MATRIX Environmental & Geotechnical Services  
215 Ridgedale Ave.  
Florham Park, NJ 07932

Chief, Air Enforcement and Compliance Assurance Branch  
Air and Radiation Division, AE-17J  
US Environmental Protection Agency, Region V  
77 West Jackson Boulevard  
Chicago, IL 60604-3590  
Attn: Compliance Tracker

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**BP Annual Heater and Boiler Update Report**  
**Appendix A**  
**December, 2003**

**NOx Emission Control Technology Already Installed**

**BP System-Wide - 2001 and Prior Years**

(see next 2 pages for 2002 & 2003 installations)

The following information is reported to satisfy the requirements of **Paragraph 15.H.iii.a (\*)** for NOx emission control technology already installed as well as heaters and boilers shutdown and permits revoked.

Refinery	Source	UNIT	Lower of Max Firing Rate or Permit Limit mmbtu/hr (1)	NOx Controls Installed	Measured NOx Emissions lb/mmbtu	Emission Rate Determ Method (2)
Carson	D570 - No. 1 Hydrogen Plant	Hydrogen		SCR	0.02	CEM
Carson	D27 - No. 1 Crude Unit	Crude		ULNB	0.03	CEM
Carson	D1465 - No. 2 Hydrogen Plant	Hydrogen		SCR/ULNB	0.02	CEM
Carson	D63 - No. 51 Vacuum Heater	Crude		SCR/ULNB	0.01	CEM
Carson	D532 - No. 1 Reformer Reaction	Reformer		NGB	0.03	CEM
Carson	D629 - H/C Frac Reboiler	Hydrocrack		ULNB	0.05	CEM
Carson	D31 - No. 4 Crude Heater	Crude		NGB	0.04	CEM
Carson	D151 - No. 1 Coker West	Coker		ULNB	0.03	CEM
Carson	D153 - No. 1 Coker East	Coker		ULNB	0.02	CEM
Carson	D155 - No. 2 Coker	Coker		ULNB	0.04	CEM
Carson	D33 - No. 22 Crude Heater	Crude		LNB	0.03	CEM
Carson	D421 - Midbarrel Feed Heater	Fluid Feed HDS		NGB	0.02	CEM
Carson	D419 - Midbarrel Reboiler			NGB	0.02	CEM
Carson	D539 - No. 1 Reformer Desulf	Reformer		LNB	0.03	CEM
Texas City	PS3A-101BA	PS 3A		ULNB	0.05	ST
Texas City	PS3A-101BB	PS 3A		ULNB	0.05	ST
Texas City	PRS4-B430 <sup>1</sup>	Power 4		ULNB	0.03	ST
Texas City	AU2-B601 <sup>3</sup>	AU2		ULNB	0.02	ST
Texas City	PS3A-102BA	PS 3A		ULNB	0.04	ST
Texas City	PS3A-102BB	PS 3A		ULNB	0.04	ST
Texas City	DDU-B302 <sup>1</sup>	DDU		ULNB	0.03	ST
Texas City	ULC-101B <sup>1</sup>	ULC		ULNB	0.03	ST
Texas City	DDU-B301 <sup>1</sup>	DDU		ULNB	0.04	ST
Toledo	ISO VAC	ISO		Shutdown	NA	NA
Whiting	WB-301	DDU		LNB	0.03	ST
Whiting	WB-302	DDU		LNB	0.03	ST

Total

**Key:**

(1) - Intentionally left blank to protect confidential business information

(2) - CEM, ST (stack test)

NGB - Next Generation Burners

ULNB - Ultra Low NOx Burners

NA - not applicable

(\*) - as amended June 7, 2002